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Attorneys for Claimant  
the County of Sonoma

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

W.R. GRACE & CO., et al.,  
Debtors.

Chapter 11

Case No. 01-01139 (JKF)

Jointly Administered

PD Claim Number 5586

Building: Sonoma County Hall of  
Justice and Jail

Hearing Date: November 14, 2005,  
12:00 p.m.

**CLAIMANT COUNTY OF SONOMA'S RESPONSE TO  
DEBTORS' FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE)  
TO ASBESTOS PROPERTY DAMAGE CLAIMS**

Claimant, the COUNTY OF SONOMA (the "County"), whose secured claim in this case was timely submitted on March 20, 2003 and has been designated Claim # 5586,<sup>1</sup> hereby submits this Response and Opposition to the Debtors W.R. GRACE & CO., et al. (The "Debtors") Fifteenth Omnibus Objection (Substantive) To Asbestos Property Damage Claims (the "Objection").

In their Objection, the Debtors offer several arguments for why the County's claim

<sup>1</sup>The County's claim was filed as claim number 1018176.

1 must be disallowed. Debtors allege that the County's claim should be dismissed because  
 2 it did not attach sufficient documentation to its Proof of Claim form (Section C-2).  
 3 Debtors also argue that: the County is seeking recovery for a product not manufactured by  
 4 Debtors (Section C-4); the County's claims should be barred as untimely by the doctrines  
 5 of constructive notice, statutes of limitation, and laches (Sections D-2, D-4, and D-6); and  
 6 the County did not provide documentation reflecting the asbestos levels of the County  
 7 properties at issue (Section E-1). For the following reasons, all of the Debtors' arguments  
 8 are invalid and the County's claim should be allowed to continue through the claims  
 9 estimation process.

10 **I. THE COUNTY PROVIDED SPECIFIC DOCUMENTATION OF THE**  
 11 **INSTALLATION OF DEBTOR'S PRODUCT AND THE PRESENCE OF**  
 12 **ASBESTOS (C-2).**

13 Although not specifying the exact defect in the County's Proof of Claim, Debtors  
 14 contend that the County either:

15 (1) indicated that it has documentation "relating to the purchase  
 16 and/or installation of the product on the property" but did not attach the  
 17 documents; or

18 (2) indicated that it "made an effort to remove, contain and/or  
 19 abate the Grace product" but did not attach documentation reflecting  
 20 same; or

21 (3) did not attach documents "relating to the purchase and/or  
 22 installation of the product in the property" and did not attach documents  
 23 "relating or referring to the presence of asbestos in the property for  
 24 which you are making this claim."

25 Objection at 24-25. Debtors are incorrect on all three counts; the County did supply the  
 26 information requested on the proof of claim form and its claim should be allowed to  
 27 proceed.

28 **A. The County Attached Documentation Relating to Its Purchase and/Or**  
**Installation of The Debtor's Product on Its Property.**

Question No. 16 of the Proof of Claim form asks the claimant whether it has  
 "documentation relating to the purchase and/or installation of the product in the  
 property." If the claimant checks "Yes," the Proof of Claim form asks the claimant to

1 attach such documentation or provide a summary.

2 The County checked "Yes" on its Proof of Claim form and attached the supporting  
3 documentation.<sup>2</sup> Attached to the Proof of Claim was a photocopy of page A-45 of  
4 construction blueprints labeled "Sonoma County Hall of Justice and Jail" by J. Clarence  
5 Feliciano, A.I.A., et al., dated June 28, 1962. The photocopy contains a diagram of a  
6 building owned by Sonoma County. On the document is a structural drawing of beams  
7 within the building. The document explains that "Zonolite-Mono-Kote" was "applied  
8 direct to structural steel member." Thus, the documentation submitted by the County  
9 satisfies Question No. 16's requirement that "documentation relating to the purchase  
10 and/or installation of the property" be provided.

11  
12 **B. The County Did Not Attempt to Remove the Debtors' Product and,**  
13 **Therefore, Was Not Obligated to Attach Any Documents Reflecting**  
14 **Such an Attempt.**

15 Question No. 22 of the Proof of Claim form asks if the claimant or someone acting  
16 on the claimant's behalf made an effort to remove, contain, and/or abate the Debtor's  
17 product, and to attach any documents reflecting these efforts. The County indicated that  
18 it had not attempted to remove the Debtor's product at the time that it filed its proof of  
19 claim, and, therefore, had no documents to attach with regard to Question No. 22.

20  
21 **C. The County Attached Documentation Reflecting Testing for The**  
22 **Presence of Asbestos on Its Property.**

23 Question No. 26 of the Proof of Claim form asks the claimant whether "you or  
24 anyone on your behalf ever conducted any testing or sampling for the presence of  
25 asbestos or other particulates in the property," and to attach any relevant documents. The  
26 County answered affirmatively that such testing or sampling had been done and attached

27  
28 <sup>2</sup>For the Court's convenience, a copy of the County's Proof of Claim is attached to  
this Response as Exhibit A.

1 the relevant documentation. More specifically, the County attached three pages of  
 2 laboratory analysis results from air sampling performed at the Hall of Justice, Sonoma  
 3 County Jail, by Multi-Tech Laboratories, Inc. The results specifically mention "Asbestos  
 4 in Bulk Materials" and indicate the volume air sampled as well as the sampling time.  
 5 Because this documentation obviously reflects testing for the Debtor's product, the  
 6 County satisfied the requirements of Question No. 26.

7  
 8 **II. THE COUNTY HAS PROVIDED SUFFICIENT EVIDENCE OF THE  
 9 PRESENCE OF DEBTORS' PRODUCT (C-4).**

10 At the same time that Debtors contend that no sampling data was submitted by the  
 11 County, Debtors also contend that the County did provide sampling data but the data is  
 12 "insufficient to determine the presence of a non-Grace product in addition to a Grace  
 13 product." Objection at 30. Debtors offer no authority for the proposition that it is  
 14 incumbent upon claimants at this stage in the proceedings to present evidence  
 15 demonstrating that their sampling data rules out non-Grace products. The evidence  
 16 attached to the County's proof of claim is all that is required. *See* Fed. R. Bankr. P.  
 17 3001(f) ("A proof of claim executed and filed in accordance with these rules shall  
 18 constitute prima facie evidence of the validity and amount of the claim."); *see also* 9  
 19 *Collier on Bankruptcy*, ¶ 3001.09[2], at p.3001-27 (15<sup>th</sup> ed. 2005) ("The party objecting  
 20 to the claim has the burden of going forward and of introducing evidence sufficient to  
 21 rebut the presumption of validity.").

22 The County also notes that Debtors admit that they only made this objection "[o]ut  
 23 of an abundance of caution," and they "are not seeking at this point to disallow or  
 24 expunge" claims on this ground. Objection at 31.

25 **III. THE COUNTY'S CLAIM WAS NOT BROUGHT TOO LATE. (D-2, D-4,  
 26 D-6).**

27 It is not appropriate to address Debtors' contentions regarding the timeliness of the  
 28 County's claim at this stage. The County responds that it should be allowed to present

evidence and argument regarding its individual claim *if* there is an actual factual dispute as to constructive or actual notice. The County should also be entitled to review the “five-step” algorithm employed by the Debtors to determine that their claim is barred by the statute of limitations. It is W.R. Grace’s burden to demonstrate when the asbestos contamination occurred. *See California Sansome Co. v. U.S. Gypsum*, 55 F.3d 1402, 1405-06 (9th Cir. 1995).

At this point, Debtors have offered no evidence of prejudice as required to assert an affirmative defense of laches under California law. *See Lam v. Bureau of Sec. & Investigative Services*, 34 Cal. App. 4th 29, 39 (1995). Nor have they demonstrated that the County’s damages from their product manifested before the statute of limitations period had run. It is not enough to assert that the County should have known about the generalized dangers of asbestos in 1983 because of reports in the press. The mere presence or knowledge of asbestos is insufficient to trigger the statute of limitation. *State Farm Mut. Auto Ins. Co. v. W.R. Grace & Co.*, 834 F. Supp. 1036, 1048-49 (C.D. Ill. 1992). Instead, the key question is when the County had knowledge that asbestos was being released from the building materials and that it presented a hazard. *Id.* Moreover, if Debtors were aware of the danger of their product but chose not to alert the County of those dangers, then the applicable limitations period should be tolled under the doctrine of fraudulent concealment.

#### **IV. THE COUNTY ATTACHED PROOF OF HAZARDOUS LEVELS OF ASBESTOS TO ITS PROOF OF CLAIM (E-1).**

Finally, the County rejects Debtors’ argument that it has provided insufficient evidence of asbestos levels on County property. As noted above, the County attached three pages of laboratory analysis to its proof of claim. These pages list air sampling results performed at the Hall of Justice, Sonoma County Jail, by Multi-Tech Laboratories, Inc. The results specifically mention “Asbestos in Bulk Materials” and indicate the


1 volume of air sampled as well as the sampling time. Given that Debtors themselves  
2 describe air sampling for asbestos as "widely accepted" (Objection at 39), the  
3 documentation submitted by the County is sufficient to show that Debtors' products  
4 created an unreasonable risk of harm and require abatement.

5  
6 **CONCLUSION**

7  
8 Based on the foregoing, the County of Sonoma requests that this Court overrule  
9 the Debtor's Fifteenth Omnibus Objection as it applies to Sonoma County's Claim.

10  
11 Dated: October 19, 2005

STEVEN M. WOODSIDE, County Counsel

12 By   
13 Mark Bartholomew  
14 Deputy County Counsel  
15 Attorneys for Claimant Sonoma County  
16  
17  
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28

CERTIFICATE OF MAILING

I am employed in the County of Sonoma, California; I am over the age of 18 years and not a party to the within action; my business address is 575 Administration Drive, Room 105A, Santa Rosa, California. I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the United States Postal Service and Federal Express overnight service.

On October 19, 2005, following ordinary business practice, I served the "CLAIMANT COUNTY OF SONOMA'S RESPONSE TO DEBTORS' FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) TO ASBESTOS PROPERTY DAMAGE CLAIMS" on the following listed party(ies), in the said cause, by placing on that date at my place of business, a true copy thereof, enclosed in a sealed envelope, for collection and mailing via overnight mail with Federal Express that same day in the ordinary course of business, addressed as follows:

Katherine Phillips  
Kirkland & Ellis LLP  
200 East Randolph Drive, Suite 6500  
Chicago, IL 60601

David W. Carickhoff, Jr.  
Pachulski, Stang, Ziehl, Young, Jones &  
Weintraub, P.C.  
919 North Market Street, 16<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on October 19, 2005, at Santa Rosa, California.

  
EILEEN SHIRED

**Exhibit A**



# **W.R. GRACE & CO. ASBESTOS PROPERTY DAMAGE PROOF OF CLAIM FORM**

*The United States Bankruptcy Court for the District of Delaware  
In re: W.R. Grace & Co., et al., Debtors, Case No. 01-01139 (JKF)  
(Jointly Administered)*

## **SUBMIT COMPLETED CLAIMS TO:**

**Claims Processing Agent  
Re: W.R. Grace & Co. Bankruptcy  
PO Box 1620  
Faribault, MN 55021-1620**

**For a complete list of the Debtors in this case, please see "The Debtors" section of the General Instructions for Completing Proof of Claim Forms. The Debtors in this case are collectively referred to in this document as "Grace".**

**If you have a current claim against Grace for property damage allegedly resulting from asbestos from a Grace product (other than Zonolite Attic Insulation), THIS ASBESTOS PROPERTY DAMAGE PROOF OF CLAIM FORM MUST BE RECEIVED ON OR BEFORE 4:00 P.M. EASTERN TIME ON MARCH 31, 2003, or you will be forever barred from asserting or receiving payment for your claim.**

[illegible]

### F.E.I.N. (Business Claimants)

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94	-	60	0	53	9
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[illegible]

1

[illegible] $\overline{MI}$ [illegible]

***M***

**Mailing Address:**[illegible][illegible]

C	A
---	---

State

95	4	03
----	---	----

Zip Code

(Province) (Postal Code)

UN	I	T	E	D	S	T	A	T	E	S
----	---	---	---	---	---	---	---	---	---	---

Country

## PART 2: ATTORNEY INFORMATION

**Law Firm Name:**

CO	UN	TY	OF	S	O	N	O	M	A	,	O	F	F	I	C	E	OF	CO	UN	TY	CO	UN	S	E	L
----	----	----	----	---	---	---	---	---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	---	---	---

W	I	L	L	A	M
---	---	---	---	---	---

**L**

*M*

A	D	A	M	S
---	---	---	---	---

**Mailing Address:**[illegible][illegible]

C	A
---	---

State

9	5	4	0
---	---	---	---

Zip Code

(Province) (Postal Code)

**Telephone:**

7	07	56	5	2	4	21
---	----	----	---	---	---	----

*Area Code*

## 1018176

**A. Real Property For Which Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

1	98	6	Description	Asbestos abatement of acoustical ceilings
Year				
			Description	
Year				
			Description	
Year				

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☐ Yes ☒ No

If yes, please specify the dates and descriptions of such renovations.

			Description	
Year				
			Description	
Year				
			Description	
Year				

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property  
☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation  
☒ Other Specify: Zonolite Monokote

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

1 9 62 ☐ I did not install the product(s)  
 Year

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

☐ Don't know.  
 Year

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☒ Yes ☐ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

19 8 4

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

PLM Analysis from survey

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

19 8 4

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

PLM Analysis from survey

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☐ Yes ☒ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☐ Yes ☒ No

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Year	Description
Year	Description
Year	Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

--

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year	Company/Individual	Type of testing:
Year	Company/Individual	Type of testing:
Year	Company/Individual	Type of testing:

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☐ Yes

☒ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year	Description
Year	Description
Year	Description



36. How did you first learn of the presence of asbestos on your property?

Attach all documents relating or referring to the presence of asbestos on the property. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession or control of the document.

If you provide a summary of the documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

37. If you do not have any documents relating or referring to the presence of asbestos on the property, explain why not and indicate who may have possession or control of any such documents with respect to the property.

38. Have you or anyone on your behalf made an effort to remove, contain and/or abate the asbestos on your property?

☐ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession or control of the document.

If you provide a summary of the documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

39. If you do not have any documents relating or referring to the removal, containment and/or abatement of the asbestos on your property, explain why not and indicate who may have possession and control of such documents with respect to the property.

40. If you or someone on your behalf did not make an effort to remove, contain and/or abate the asbestos on your property, to the best of your knowledge, did anyone else make such an effort?

☐ Yes ☐ No



41. If you responded Yes to question 38. or question 40. and you have not supplied related documents, please specify the dates and descriptions of any such efforts.

Description   
Year

Description   
Year

Description   
Year

42. Have you or anyone on your behalf conducted any other testing or sampling for the presence of asbestos on your property?

☐ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession or control of the document.

If you provide a summary of the documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

43. If you do not have any documents relating or referring to any other such testing or sampling for the presence of asbestos on your property, explain why not and indicate who may have possession or control of such documents with respect to the property.

44. If you or someone on your behalf did not conduct any other testing or sampling for the presence of asbestos on your property, to the best of your knowledge, did anyone else conduct such testing or sampling?

☐ Yes ☐ No

45. If you responded Yes to question 42. or question 44. and you have not supplied related documents, please specify the dates and descriptions of any such efforts.

Description   
Year

Description   
Year

Description   
Year

46. Were you aware of the presence of asbestos on your property when you purchased your property?

☐ Yes ☐ No

47. If you have sold the property, were you aware of the presence of asbestos on your property when you sold your property?

☐ Yes ☐ No ☐ Not Applicable, have not sold the property

## PART ASBESTOS LITIGATION CLAIMS

**A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☒ No  
☐ Yes – lawsuit  
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☐ Yes – lawsuit  
☒ Yes – non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption

b. Court where suit originally filed:

Docket No.:

County/State

c. Date filed:

 -  - 

Month Day Year

a. Caption

b. Court where suit originally filed:

Docket No.:

County/State

c. Date filed:

 -  - 

Month Day Year

a. Caption

b. Court where suit originally filed:

Docket No.:

County/State

c. Date filed:

 -  - 

Month Day Year

(Attach additional pages if necessary.)

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim: Asbestos property damage

b. Date submitted: 08 - 23 - 1989  
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☒ Other Johns Manville Corp-Manville Property Damage Settlement Trust  
 Name of Entity

a. Description of claim: \_\_\_\_\_

b. Date submitted: \_\_\_\_ - \_\_\_\_ - \_\_\_\_  
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other \_\_\_\_\_  
 Name of Entity

a. Description of claim: \_\_\_\_\_

b. Date submitted: \_\_\_\_ - \_\_\_\_ - \_\_\_\_  
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other \_\_\_\_\_  
 Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

Frank Donahue  
 SIGNATURE OF CLAIMANT FOR SNOHOMISH COUNTY

03 - 20 - 2003  
 Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In re :**

**Chapter 11**

**W.R. GRACE & CO., et al.**

**Case No. 01-01139 (JKF)  
(Jointly Administered)**

**Debtors.**

---

**ATTACHMENTS FOR CLAIM NO. 1018176  
CLAIM OF COUNTY OF SONOMA, CALIFORNIA**

**ATTACHMENT FOR SECTION C. NO. 16.**

Photocopy of blueprint section: from page A-45 of construction blueprints labeled, "Sonoma County Hall of Justice and Jail," by J. Clarence Feliciano, A.I.A., et al, dated 6/28/62.

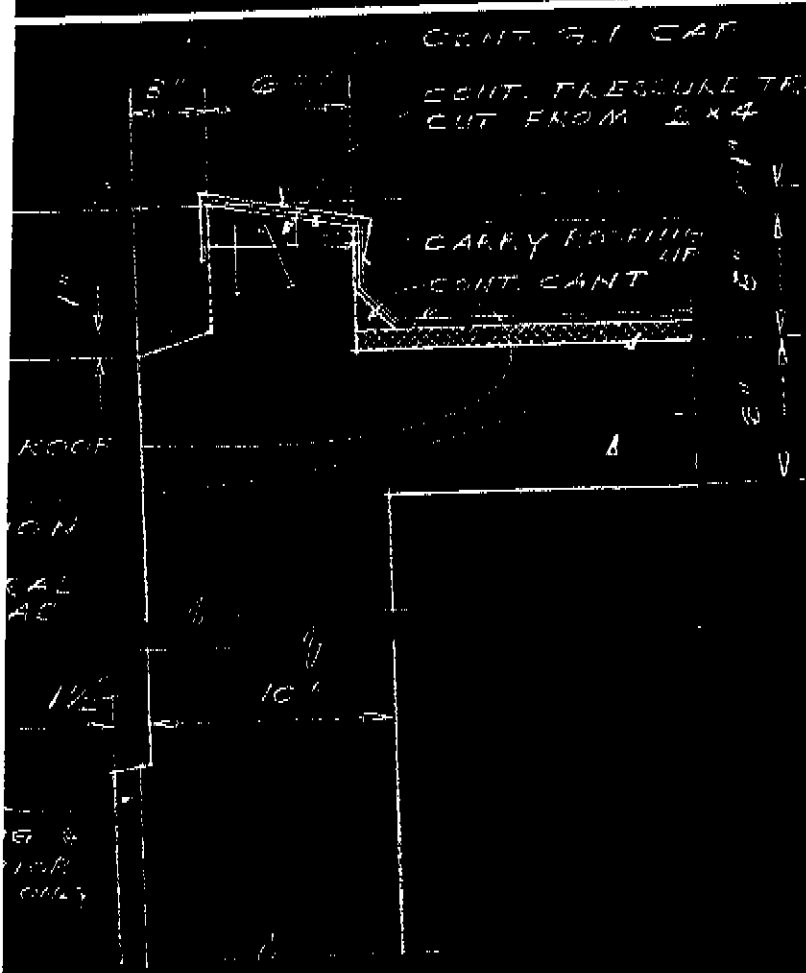
**ATTACHMENT FOR SECTION C. NO. 26.**

1. Laboratory analysis results from sample of fireproofing on structural beam at Hall of Justice, by Acculab Environmental Services.

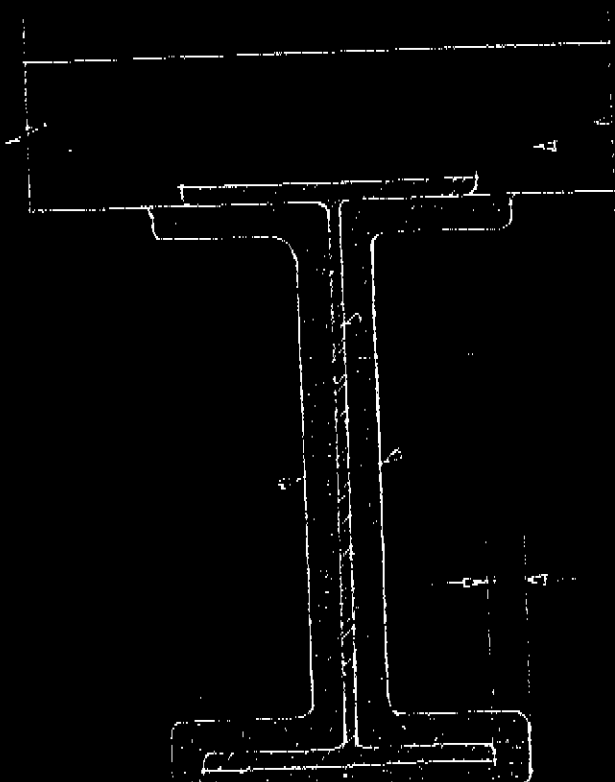
2. Laboratory analysis results from air sampling performed at Hall of Justice, Sonoma County Jail, by Multi-Tech Laboratories, Inc.

The source documents are available for verification at:

County of Sonoma  
Facilities Operations Division  
2680 Ventura Ave.  
Santa Rosa, CA 95403



TYPICAL PARAPET @ JAIL ROOF  
 1/4" TYPICAL



STEEL BEAM  
 FLOOR SLAB

WF BEAMS  
 SEE STRUCTURAL  
 DRAWINGS

1/4" "ZONOLITE -  
 MONO-KOTE" APPLIED  
 DIRECT TO STRUCTURAL  
 STEEL MEMBER

1/4" TYPICAL  
 ALL AROUND WF

**BROKAW AND MURAKAMI**  
 CONSULTING ENGINEERS  
 GEO. K. BROKAW, M.E., E.E.    J. F. MURAKAMI, M.E.  
 SANTA ROSA, CALIFORNIA

**ARTHUR B. SMITH, JR.**  
 STRUCTURAL ENGINEER  
 SAN FRANCISCO, CALIFORNIA

**DEMARS AND REAY ASSOCIATED**  
 ARCHITECTURAL & PLANNING CONSULTANTS  
 VERNON DEMARS, AIA    D. F. REAY, F.R.I.B.A.  
 BERKELEY, CALIFORNIA



3700 Lakeville Highway, Petaluma, CA 94954  
 P.O. Box 808024, Petaluma, CA 94975-8024  
 Telephone: (707) 783-8245 FAX: (707) 763-4065

Ken Meyer  
 Architect - Sonoma County  
 455 Fiscal Dr.  
 Santa Rosa, CA 95401

Client Code: ARCH2  
 Contract/PO # 49057

Page 1

# LABORATORY RESULTS

Date Collected: 07/15/89  
 Date Analyzed: 08/03/89

Laboratory Job No.: 893265  
 Date Received: 07/18/89  
 Date Reported: 08/03/89

## ASBESTOS IN BULK MATERIALS (PLM, EPA-600/M4-82-020)

LABNO	SMPLNO	SMPL. DESCRIPTION	ASBESTOS % TYPE	OTHER COMPONENTS % TYPE
43685	1A	BULK TAN	15 CHRYSOTILE	50 GYPSUM 35 MICA
H.O.J. Sheriff office. Sprayed insulation on beam over crime scene & I.D. section above suspended ceiling.				
43686	2A	BULK TAN	NONE DETECTED	30 MINERAL WOOL 30 DIATOMACEOUS EARTH 25 ORGANIC BINDER 10 QUARTZ 5 MICA
H.O.J. E.O.C. Generator lagging in Mechanical room.				
43687	3A	BULK WHT/BRN	NONE DETECTED	85 ORGANIC MATRIX 15 CELLULOSE FIBERS
H.O.J.-E.O.C. computer room floor.				
43688	4A	BULK TAN	20 AMOSITE 10 CHRYSOTILE	60 CLAY 10 MINERAL WOOL
Soc. Serv. roof air handler "A" straight lagging. Did not sample elbow.				
43689	5A	BULK WHT	15 CHRYSOTILE	35 CLAY 30 GYPSUM 20 MINERAL WOOL

Soc. Serv. 1st floor sprayed insulation above suspended ceiling in front of elevator. penthouse "B" deteriorating lagging.

THIS REPORT HAS BEEN REVIEWED  
 AND APPROVED FOR RELEASE.  
 Cse No. 01-01189 (JKF)  
 Claim No. 1018176

CC0005

3700 Lakewood Highway, Petaluma, CA 94952  
 P.O. Box 808024, Petaluma, CA 94975-8024  
 Telephone: (707) 763-6245 FAX: (707) 763-4088

## SAMPLING DATA - ANALYSIS REQUEST

PO. NUMBER:	49057
RELEASE NO.	
SURVEY NO.	

NAME OF COMPANY SONOMA COUNTY ARCH.	SAMPLE COLLECTED BY KEN MEYER	DATE COLLECTED 7/15/89
MAILING ADDRESS 455 FISCAL DRIVE SANTA ROSA, CA 95403	SPECIAL INSTRUCTIONS BULK ANALYZE FOR ASBESTOS	
TELEPHONE NO. 707-527-3211		

LABORATORY NO.	SAMPLE NUMBER	SAMPLE LOCATION OR DESCRIPTION	VOLUME OF AIR SAMPLED	ANALYZE FOR (GIVE SPECIFIC SUBSTANCES)
	1A	HALL OF JUSTICE - SHERIFF OFF SPRAYED INSULATION ON BEAM OVER CRIME SCENE & ID SECT. OVER SUSPENDED CEILING		
	2A	HALL OF JUSTICE - EOC GENERATOR LAGGING IN MECH ROOM		
	3A	HALL OF JUSTICE - EOC COMPUTER FLOOR		
	4A	SOCIAL SERVICES - ROOF AIR HANDLER "A" STEEL JOIST LAGGING DID NOT SAMPLE ELBOW		

AUTHORIZED SIGNATURE:

RELINQUISHED BY: (SIGNATURE) <i>Ken Meyer</i>	DATE/TIME 6/15/89	RECEIVED BY LAB BY: (SIGNATURE)
RELINQUISHED FROM LAB BY: (SIGNATURE)	DATE/TIME	RECEIVED BY: (SIGNATURE) Cse No. 01-01189 (JKF) Claim No. 1018176



# Multi-Tech Laboratories, Inc.

SANTA ROSA OFFICE: 34 West 3rd Street, Suite 9, 95401 • (707) 544-6670

CLIENT Sonoma County Risk Management  
ADDRESS 2230 Professional Drive  
Santa Rosa, CA 95401

DATE COLLECTED 5-1-84  
DATE IN LAB 5-1-84  
COLLECTED BY Cheryl Smith  
SAMPLE TYPE Air

LABORATORY NO.:

4 7050

CLIENT I.D.:

Sonoma County Jail

COMPOUND SAMPLED:

Asbestos

COLLECTION DEVICE:

Open face D.81 mixed cellulose ester filter

PUMP FLOW RATE:

1.0 L/minute

SAMPLING TIME:

17 minutes

VOLUME OF AIR SAMPLED

17 L

SAMPLE METHOD NUMBER:

DOSH X2

NIOSH ANALYTICAL METHOD NUMBER:

P & CAM 239

RESULTS:

0.402 fiber/cc

**RECEIVED**

JUL 6 1984

RISK MANAGER  
COUNTY OF SONOMA

Multi-Tech Laboratories, Inc.

*Cheryl A. Smith*

LABORATORY DIRECTOR DATE  
Cheryl A. Smith 7-5-84

Case No. 01-01139 (JMR)

Claim No. 1018176